

SC NAACP v. Alexander,
D.S.C. Case No. 3:21-cv-03302-MGL-TJH-RMG

Exhibit G

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

THE SOUTH CAROLINA
STATE CONFERENCE OF
THE NAACP, et al,

Plaintiffs,

vs.

CASE NO.

3:21-CV-03302-MBS-TJH-RMG

THOMAS C. ALEXANDER,
et al,

Defendants.

VIDEOCONFERENCE

DEPOSITION OF: WILLIAM ROBERTS

DATE: July 7, 2022

TIME: 9:35 a.m.

LOCATION: 1310 Gadsden Street
Mahogany Conference Room
Columbia, SC

TAKEN BY: Counsel for the Plaintiffs

REPORTED BY: ERIC GLAZIER, Court Reporter

1 Do you recall that?

2 A. Yes.

3 Q. Did I ever draw any maps?

4 A. No.

5 Q. Did I ever direct the drawing of any
6 district lines?

7 A. No.

8 Q. Did I ever share any maps that someone
9 else had drawn?

10 A. No.

11 Q. Okay.

12 Mr. Cusick asked you about public
13 comments that the redistricting project was rigged.
14 Do you remember that conversation?

15 A. Yes, I do.

16 Q. Do you think the process was rigged?

17 A. No.

18 Q. How would you describe the process?

19 A. I'd say it was a pretty transparent
20 process as far as the map drawing and the
21 information that's available to the public. I'd
22 say that politics really drove the decisions that
23 were made on the map.

24 Q. Can you elaborate on that?

25 A. Senator Campsen really played a large

1 role in determining which map made it to the
2 full -- to the -- out of subcommittee, and he
3 really wrestled with the fact that, you know, he
4 was moving a large chunk of Charleston out of the
5 first congressional district, which was his home
6 county. And he was having to determine, do I want
7 more of Charleston or do I want more republican
8 representation in the first congressional district.
9 And so that was a real political decision he had to
10 make.

11 Q. And did he ever tell you which decision
12 he made?

13 A. Yes, he did. He told me he was going
14 with the plan that had the higher Trump percentage
15 over more of Charleston.

16 Q. Now, earlier this morning, you
17 discussed whether you considered BVAP with
18 Mr. Cusick.

19 Do you remember that?

20 A. Yes.

21 Q. And he asked you whether considering
22 BVAP is helpful in drawing a plan and whether you
23 did on past clients.

24 Do you remember that?

25 A. Yes.

1 A. Considered those were recommendations
2 by the congressional members, as the criteria was
3 adopted by the subcommittee.

4 Q. And did complying with those
5 recommendations or implementing those
6 recommendations require you to violate any of the
7 criteria in the senate redistricting guidelines?

8 A. That's going to be up to the legal team
9 to decide.

10 Q. Were there districts other than
11 District Six that experienced only minimal changes
12 in the plan?

13 A. District Seven was really a
14 minimal-change plan. We just balanced the
15 population out. Didn't have to do too much because
16 the population broke in Horry County and in the
17 coastal region of South Carolina.

18 Q. How about District Two?

19 A. District Two had minor modifications,
20 not too much at all. The biggest swap was going to
21 be between District One and Six.

22 Q. And how about District Three, was that
23 a minimal-change district?

24 A. I believe so. We split -- we fixed
25 some precinct splits that were in that area and